

Brown, Lee-Ann

From: Glaws, J. Peter <Peter.Glaws@carrmaloney.com>
Sent: Wednesday, March 24, 2021 10:37 AM
To: Lynch, Thomas
Cc: Brown, Lee-Ann; Glaws, J. Peter
Subject: RE: subpoena to Prager Metis [IWOV-CarrMaloney_Docs.FID235450]

[External Email]

Tom,

Prager Metis (which includes employees and partner Marnette Myers) was not engaged by Mr. Deluca, his counsel, or anyone else to prepare any documents/collate/summarize expenditures related to 6122 Lee Highway, either generally or in specific relation to this lawsuit

Peter

J. Peter Glaws, IV | Partner
peter.glaws@carrmaloney.com

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From: Lynch, Thomas <tlynch@bradley.com>
Sent: Tuesday, March 23, 2021 4:12 PM
To: Glaws, J. Peter <Peter.Glaws@carrmaloney.com>
Cc: Brown, Lee-Ann <labrown@bradley.com>
Subject: RE: subpoena to Prager Metis [IWOV-CarrMaloney_Docs.FID235450]

Peter,

Checking on response to the below. Thank you.

Tom

From: Lynch, Thomas <tlynch@bradley.com>
Sent: Tuesday, March 16, 2021 8:24 PM
To: Glaws, J. Peter <Peter.Glaws@carrmaloney.com>; Brown, Lee-Ann <labrown@bradley.com>
Cc: Said, Stacy C. <Stacy.Said@carrmaloney.com>
Subject: RE: subpoena to Prager Metis [IWOV-CarrMaloney_Docs.FID235450]

Peter,

Thank you for responding to my subpoena. I appreciate it.

One question in particular I'd like to get to the bottom of: I'd like to confirm, as we discussed, that your client was not engaged by Mr. Deluca or any other person to collate and summarize expenditures that Mr. Deluca (or any entity, person, affiliate or similar person controlled by Mr. Deluca) incurred with respect to construction at 6122 Lee Highway in order to produce those documents in a lawsuit that was filed against Mr. Deluca? I would appreciate it if you could just confirm that fact.

Thank you.

Tom

Thomas Ryan Lynch

Partner | [Bradley](#)
tlynch@bradley.com
202.719.8228

From: Glaws, J. Peter <Peter.Glaws@carrmaloney.com>
Sent: Tuesday, March 16, 2021 4:03 PM
To: Brown, Lee-Ann <labrown@bradley.com>; Lynch, Thomas <tlynch@bradley.com>
Cc: Said, Stacy C. <Stacy.Said@carrmaloney.com>; Glaws, J. Peter <Peter.Glaws@carrmaloney.com>
Subject: RE: subpoena to Prager Metis [IWOV-CarrMaloney_Docs.FID235450]

[External Email]

Tom and Lee-Ann,

Attached is the response of Prager Metis to the Subpoena. Thank you for the extension of time. As you will see in the attached letter, there are certain documents where we cannot currently tell whether or not they are responsive. We are working on that issue as quickly as possible.

Best,

Peter

J. Peter Glaws, IV | Partner

peter.glaws@carrmaloney.com

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<image001.png>

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<image002.png>

<image003.png>

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